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Clerk, U.S. District Court  
W.D. of TN, Memphis

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

Shaeon Kirkwood

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. \_\_\_\_\_

Longistics Transportation

(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Shaeon Kirkwood  
(name of plaintiff)

is a citizen of the United States and resides at 1218 Winchester Rd  
(street address)

Memphis  
(city)

US  
(country)

TN  
(state)

381  
(zip code)

(901) 730-4155 ext 316  
(telephone number)

3. Defendant Longist's Transportation  
(defendant's name)

lives at, or its business is located at 4638 Southridge Drive  
(street address)

Memphis, TN 38116

4. Plaintiff sought employment from the defendant or was employed by the defendant at

4638 Southridge Dr  
(street address)

Memphis US TN 38118  
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 26 10 2010

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 29 7 2011.

(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 29 7 2011.

(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 18 1 2011. (Attach a copy of the notice to this complaint.)

9. Because of plaintiff's (1) race, (2) color, (3) ✓ sex, (4) religion, (5) national origin, defendant

(a) failed to employ plaintiff.

(b) terminated plaintiff's employment.

(c) failed to promote plaintiff.

(d) Other - retaliation

10. The circumstances under which defendant discriminated against plaintiff were as follows: I was involved in a consensual relationship (prior to being hired) with my teammate; and the relationship soured and severed, in Sept. of 2010. As a result of my teammate and me having a verbal altercation (he was cursing me out) with Dispatch on the phone, we were both terminated October, 26, 2010. No reason was given for my termination. Ultimately, my teammate was Relieved and Fired again. I started working for the company August 23, 2010, in the position of Over the Road/Team Truck Driver

11. The acts set forth in paragraph 9 of this complaint

- (a)  are still being committed by defendant.
- (b)  are no longer being committed by defendant.
- (c)  may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a)  Defendant be directed to employ plaintiff, or
- (b)  Defendant be directed to re-employ plaintiff, or
- (c)  Defendant be directed to promote plaintiff, or;
- (d)  Defendant be directed to Reemploy and retain employee and back pay for time lost.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes () No ()



SIGNATURE OF PLAINTIFF